

ORIGINAL

FILED  
Clerk  
District Court

DEC 22 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

JAMES D. LIVINGSTONE  
KRISTIN D. ST. PETER  
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Commonwealth of the Northern Mariana Islands  
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Attorneys for: Defendants CNMI, Forelli, Bush, Cotton and Brown

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, NICOLE C. FORELLI,  
WILLIAM C. BUSH, D. DOUGLAS COTTON,  
L. DAVID SOSEBEE, ANDREW CLAYTON,  
UNKNOWN AND UNNAMED PERSONS IN  
THE CNMI OFFICE OF THE ATTORNEY  
GENERAL, ALEXANDRO C. CASTRO, JOHN  
A. MANGLONA, TIMOTHY H. BELLAS,  
PAMELA BROWN, ROBERT BISOM, AND  
JAY H. SORENSEN,

Defendants.

Case No. 05-0027

**DEFENDANTS  
NOTICE OF MOTION AND MOTION  
TO DISMISS, DECLARATIONS OF  
BROWN, FORELLI AND COTTON  
[Fed. R. Civ. P. 12 (b) (6)]**

**HEARING:** FEB 09 2006  
**TIME:** 9:00 a.m./p.m.

**NOTICE**

PLEASE TAKE NOTICE THAT on FEB 09 2006 at 9:00 a.m./p.m., or as  
soon thereafter as the matter may be heard, in the above-entitled Court, the Office of the Attorney  
General of the Commonwealth of the Northern Mariana Islands, on behalf of Defendants

1 Commonwealth of the Northern Mariana Islands, Nicole Forelli, William Bush, D. Douglas Cotton,  
2 and Pamela Brown, will and hereby do move this Court, pursuant to Rules 12(b)(6) of the Federal  
3 Rules of Civil Procedure to dismiss this action for failure to state a claim upon which relief can be  
4 granted.

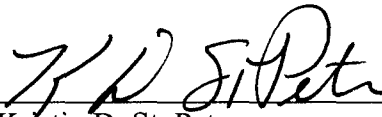
5 This Motion is based upon this Notice of Motion, Motion and incorporated Memorandum of  
6 Points and Authorities, all pleadings and papers on file herein, all matters of which judicial notice may  
7 be taken, and upon such further argument and evidence as may be considered by the Court at or before  
8 the hearing on this matter.

9 Respectfully submitted,

10 OFFICE OF THE ATTORNEY GENERAL

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13 Dated: December 22, 2005.

By

  
Kristin D. St. Peter